

COHEN, DIPPELL AND EVERIST, P. C.
CONSULTING ENGINEERS

DONALD G. EVERIST
SUDHIR K. KHANNA
WARREN M. POWIS
JOHN R. URAM, JR.
ROBERT W. GUILL
WILSON A. LA FOLLETTE

RADIO-TELEVISION
1300 L STREET, N. W.
SUITE 1100
WASHINGTON, D. C. 20005
(202) 898-0111

JULIUS COHEN
(1913-1993)
RALPH E. DIPPELL, JR.
(1922-1992)
FACSIMILE
(202) 898-0895

E-MAIL:
CDEPC@WORLDNET.ATT.NET

November 13, 1996

RECEIVED

NOV 13 1996

Federal Communications Commission
Office of Secretary

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Rm. 222
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

Re: Request to Extend Comment and Reply
Comments MM Docket 87-268

Dear Mr. Caton:

The Federal Communications Commission ("Commission") on August 14, 1996, released its Sixth Further Notice of Proposed Rule Making ("Sixth Further Notice") in MM Docket No. 87-268 (In the Matter of Advanced Television Systems and Their Impact upon the Existing Television Broadcast Service). This document provides a draft Table of DTV Allotments and policies and procedures for developing and assigning DTV frequencies. The Commission's document not only provides valuable insight regarding DTV channel allotment methodologies, but requests comments on a number of issues. The Commission has requested that comments be filed by November 22, 1996, and reply comments by December 23, 1996. It is requested that these dates be extended to permit further study of the multiple technical issues related to the digital television operation.

This office has reviewed the Sixth Further Notice to respond to numerous technical questions for various parties. We note that the Broadcast Caucus is also studying the Commission's DTV proposal and has made considerable effort to identify any known errors in the Commission's technical data base and that process continues.¹

This office believes that there are a number of questions which cannot be adequately addressed by November 22, 1996. For example, WHMM-TV, Channel 32, Washington, D.C., is assigned Channel 6 for its DTV operation which is adjacent to the non-commercial educational FM band. In Washington, D.C., there are a number of FM

¹This is a necessary function as the technical data base is used in the extensive coverage and interference calculations.

No. of Copies rec'd
List ABCDE

022

COHEN, DIPPELL AND EVERIST, P. C.

Mr. William F. Caton
November 13, 1996
Page 2

educational stations such as WAMU(FM) and WPFW(FM)² which can adversely impact on the proposed channel 6 DTV operation.

In addition, detail studies are required to determine whether a 1 kW DTV operation on Channel 6 can provide reliable DTV service to a large metropolitan area such Washington D.C. as proposed for WHMM-TV.

Furthermore, this office notes that many small market stations are trying to make assessments on the Sixth Further Notice, however, many of these stations do not have extensive resources to study these various issues in an abbreviated time frame dictated by the current comment dates.

We note that NTIA is attempting to offer a computer service to the broadcasters which would enable them to make assessment of alternative DTV channels. We understand that NTIA has not been able to offer that service due to initial programming difficulties. This would be a valuable resource and would contribute to a more complete understanding of various proposals.

It is also noted that the Commission has not proposed any rules or methods for determining impact of DTV on the adjacent channel mobile operations. The current NTSC stations are not permitted full authorized power due to adverse impact on mobile operations.

Based upon the above, this office believes that additional time is needed to study the technical issues including propagation,³ protection ratios to and from other services, out-of-band emissions, etc. contained in the Sixth Further Notice. Therefore, it is requested that the Commission extend the date for the comments and reply comments as it pertains to these technical issues by an additional sixty days. This additional time will put the comment beyond the very busy holiday season that is rapidly approaching.

²WAMU(FM), Channel 203, 50 kW (H&V) and 152 M HAAT
WPFW(FM), Channel 207, 50 kW (H&V) and 125 M HAAT

³For example, the K factor in propagation models may need to be scrutinized to ascertain the appropriate value.

COHEN, DIPPELL AND EVERIST, P. C.

Mr. William F. Caton
November 13, 1996
Page 3

If there are any questions, please do not hesitate to contact
this office.

Sincerely,

A handwritten signature in black ink, appearing to read "Donald G. Everist", written over the typed name.

Donald G. Everist
Consulting Engineer
District of Columbia
Professional Engineer
Registration No. 5714

DGE:mcw